

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Tanner McCormack and,
Tyler McCormack,

Court File No.: 07-CV-2651 (DWF/JJK)

Plaintiffs,

v.

City of Minneapolis, Minnesota;
Dale Burns, in his individual and official
capacities; Jeremiah T. Kocher, in his
individual and official capacities;
James G. Lynch, in his individual and
official capacities; Harvey Blumenthal,
in his individual capacity; Mark Hilliard,
in his individual capacity; Block e/McCaffery
Interests/LLC, a foreign corporation;
McCaffery Interest, Inc., a foreign corporation;
Warehouse District Business Association, Inc.,
Securitas Security Services, Incorporated,
a foreign corporation, and John Does 1-5,

Defendants.

***DEFENDANTS BLOCK e/McCAFFERY INTERESTS/LLC AND McCAFFERY
INTEREST, INC.'S MOTION TO COMPEL DISCOVERY AND AWARD
ATTORNEY'S FEES***

Defendants, Block e/McCaffery Interests/LLC and McCaffery Interest, Inc.,
hereby respectfully move this Court pursuant to Fed. R. Civ. P. 37 for an Order granting
Defendants' Motion to Compel Plaintiffs to fully respond to interrogatories submitted
pursuant to Fed. R. Civ. P. 33, document requests submitted pursuant to Fed. R. Civ. P.

34, medical reports and authorizations and for an award of costs, including attorney's fees, related thereto.

This Motion is based upon the attached Memorandum of Law, affidavit of counsel, all of the files, records and proceedings herein, and the arguments of counsel at the hearing.

Respectfully submitted,

Dated: October 5, 2012

/s/ Patrick M. Biren

Patrick M. Biren

Bar Number 0317263

Attorney for Defendants Block
e/McCaffery Interests, LLC and
McCaffery Interest, Inc.

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